

FEDERAL BUREAU OF INVESTIGATION

REGULATORY INSPECTION REPORT (18 USC 2257)

OF

**Tennervision
(Legend Video, Inc.)
9145 Owensmouth Ave.
Chatsworth, CA 91311**

Date of Inspection: 10/10/2006

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REGULATORY INSPECTIONS REPORT

Report of: SSA Charles R. Joyner,
2257 Regulatory Inspections Program,
Violent Crimes Section, Criminal Investigative Division
Report Date: October 18, 2006
File Number: [REDACTED] (F) Tennervision

PRODUCER INFORMATION

An inspection was conducted of Tennervision (dba Legend Video, Inc.) pursuant to 18 USC 2257 and 28 Code of Federal Regulations Part 75. The inspection was conducted at Legend Video, Inc. on October 10, 2006, at 9145 Owensmouth Ave., CA 91311. [REDACTED] owner of Legend Video, Inc. and the listed Custodian of Records for Tennervision films, telephone number (818)734-4200, granted access and was present during the inspection. After showing the inspectors to the area of 2257 records storage, [REDACTED] provided a copy of a statement prepared by his attorney, Jeffery Douglas, advising all businesses at that address are "secondary producers" and not subject to a 2257 inspection. [REDACTED] was listed as the Custodian of Records on the reviewed videos, the address for the location of 2257 records was identical to the address of Legend Video, Inc., and [REDACTED] advised Tennervision was a "label" used by Legend Video, Inc. Based on this information, SA Joyner expressed his confidence that Legend Video, Inc. is a primary producer and subject to inspection. [REDACTED] was fully cooperative, indicated no reluctance to assist with the inspection, and provided a conference room to be used by the inspectors.

INSPECTION SUMMARY

DVDs produced by Tennervision were ordered from the internet. Contract inspectors reviewed five DVDs and identified all performers by stage name or by still photographs taken from the video. All videos reviewed contained the required 2257 information in the proper format. A total of 52 performers were identified as appearing in the five DVDs. Prior to the inspection, contract inspectors printed several still photographs of each performer's face from different camera angles. During the inspection, the still photographs were compared with the performer identification on record to ensure the identification was, in fact, of that performer.

After the inspection on October 10, 2006, it was determined Tennervision had only one minor 2257 violation. The sole violation was failure to maintain the 2257 cross reference system up to date. A random check of the cross reference system discovered one performer who was not cross referenced properly.

During this inspection, all provisions of 18 USC 2257 guidelines were followed by the inspection team.

FINDINGS

1. The records were properly cross referenced, but were not entirely updated. A 3x5 card system had been implemented to cross reference performer's stage names, true names, and movies. However, a random check revealed records for at least one performer (P-1) were not current.

28 CFR Part 75.3 - "Records required to be maintained under this part shall be categorized and retrievable to: All name(s) of each performer, including any alias, maiden name, nickname, stage name or professional name of the performer; and including the title, number, or other similar identifier..."

"Only one copy of each picture of a performer's picture identification card and identification document must be kept as long as each copy is categorized and retrievable according to any name, real or assumed, used by each performer, and according to any title or other identifier of the matter."

28 CFR 75.2(a)(3) – Records are to be organized alphabetically and cross-referenced to each alias or other name used and to each title.

Producer Response to Findings:

1. It was apparent Legend Video, Inc. was maintaining and frequently updating their 2257 cross reference record system. They agreed to entirely update this system immediately.

PRE-INSPECTION PROCEDURES

The following Pre-Inspection Procedures were followed:

1. Tennervision was randomly selected from a data base provided by FBIHQ of known producers of adult products using a computerized random selection program.
2. A sample of Tennervision DVDs was ordered and the method of purchase was documented and maintained in a 1A envelope with the case file.
3. All products ordered were reviewed for 18 USC 2257 compliance and a pre-inspection analysis was conducted for each of the DVDs ordered.
4. All performers depicted in the videos engaging in sexually explicit conduct were identified by either a stage name or by still photographs of their likeness taken from the video.

INSPECTION PROCEDURES

The following Inspection Procedures were followed:

1. Inspection began at approximately 9:30 a.m. during regular business hours.
2. SSA Charles Joyner, the Lead Inspector, immediately identified himself and the purpose of the inspection upon entering Legend Video, Inc.
3. SSA Joyner explained the nature and purpose of the inspection, including the limited nature of the records inspection.
4. Digital photographs were taken of the business and the room used to store 2257 information prior to the inspection. A disc containing a total of five photographs were placed in a 1A envelope and maintained with the case file.
5. Inspectors reviewed the 18 USC 2257 records maintained by Legend Video, Inc. for the five videos reviewed, to include the performers appearing therein.
6. Copies were made of the selected performers' identifications indicating date of birth.
7. The inspection concluded at approximately 12:00 p.m.
9. Digital photographs were taken of the room used to store 2257 information prior to the inspectors departing the place of business.

RECORDS VERIFICATION SPREADSHEET

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[illegible]

PHOTO LOG/PHOTOS

CAMERA DSLR
 FILM: ASA Digital
 ROLL No.

Light - Available - A
 Elec.Strobe - E
 Flashbulb - F

Photo Log Sketch

Description

Photo No. Lens Light SS f - stop

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Tennervision 10/10/2006
 Legend Inc.
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 Tennervision records
 records checked here

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REMARKS

SUBJECT TO PROTECTIVE ORDER

Tennervision
 FBI_000775

INSPECTION COMPLIANCE DETERMINATION

Tennervision (Legend Video, Inc.) was determined to be essentially in compliance with 18 USC 2257 and 28 CFR 75.